

September 6, 2022

*Via email: [expartecommunications@hq.doe.gov](mailto:expartecommunications@hq.doe.gov)*

Kevin Stork  
Vehicle Technologies Program, EE-3V,  
U.S. Department of Energy  
1000 Independence Avenue, SW,  
Washington, DC 20585-0121

Re: Ex Parte Memorandum for Meeting on August 30, 2022

*Petroleum Equivalence Factor, Notification of Petition for Rulemaking*  
Docket Number EERE-2021-VT-0033

On August 30, 2022, Pete Huffman (Natural Resources Defense Council), Dan Meszler (Meszler Engineering Services, consultant for NRDC), Joshua Berman (Sierra Club), and Vera Pardee (outside counsel for Sierra Club) met virtually with Kevin Stork (Department of Energy, Office of Energy Efficiency & Renewable Energy) and Ami Grace-Tardy, Peter Cochran, and Alexandra Klass (Department of Energy). Also in attendance was Vinay Nagabhushana (Department of Transportation, National Highway Traffic Safety Administration (NHTSA)).

We discussed matters concerning NRDC and Sierra Club's pending petition for rulemaking to update Department of Energy (DOE) regulations at 10 C.F.R. part 474 for calculating equivalent petroleum-based fuel economy values for electric vehicles for use in determining automakers' compliance with the Department of Transportation's Corporate Average Fuel Economy (CAFE) program. We provided DOE results of sensitivity modeling for various equivalency values. We encouraged DOE to update the regulations and to coordinate with NHTSA on implementing updated regulations.

If you require any additional information, please contact us.

Sincerely,

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